

## OUTSTANDING DISCOVERY TO PLAINTIFFS

<b>KNOWLTON, et al., v. CITY OF WAUWATOSA, et al. ; CASE NO. 20-cv-01660</b>		
<b>DATE</b> 03/03/2021	<b>Deficient Responses</b> Rec'd 04/02/2021	<b>OUTSTANDING DISCOVERY to DEFENDANTS' FIRST REQUEST FOR ADMISSIONS, INTERROGATORIES, and REQUESTS FOR PRODUCTION OF DOCUMENTS AS TO PLAINTIFFS KATHRYN KNOWLTON and DANA McCORMICK</b>
	<b>INTERROGATORY</b>	<b>OUTSTANDING DISCOVERY</b>
	No. 1	Plaintiffs have not stated all facts that tend to support their refusal to admit as it relates to Admission Nos. 1, 2, 4, 6, 8 through 30, 33 through 44, 46, 47, and 50 through 55.
	No. 2	Plaintiffs have not provided a list all contacts they have had with law enforcement agencies including, but not limited to, arrests, ordinance violations, and warnings – and to include the date, location, agency involved, their participation in, and the final result of the contact, from January 1, 2011 to the present.
	No. 3	Plaintiffs have not identified all statements they or anyone acting on their behalf have taken from any individual with information relevant to the allegations contained in the Complaint filed in this action and have not stated the name and address of each individual who conducted an interview or obtained a statement, nor identified by name and address the person from whom such a statement has been taken, the date of the statement, and whether the statement was recorded in any fashion. If the statement was oral, plaintiffs have not described the factual nature of the statement nor described why the statement was not recorded in some fashion.
	No. 4	Plaintiffs have not provided a list of the names, addresses, and phone numbers of all witnesses that have provided the statements listed in Interrogatory No. 3, above.
	No. 8	Plaintiffs have not explained in detail how the arrests of Plaintiffs were unjustified and unreasonable seizures as alleged in Paragraph 61 of their Complaint.
	No. 9	Plaintiffs have not explained in detail how the actions of these Defendants were done in willful, wanton, reckless, and malicious disregard of the Plaintiffs' constitutional rights as alleged in Paragraph 66 of their Complaint.
	No. 10	Plaintiffs have not itemized in detail all medical expenses they have incurred regarding the allegations contained in their Complaint.
	No. 11	Plaintiffs have not explained in detail how the policy and practices of the Defendants by directing and ordering the emergency curfew was unreasonable and unjustified and interfered with Plaintiffs' First Amendment rights as alleged in Paragraph 73 of their Complaint.
	No. 12	Plaintiffs have not itemized in detail all expenses or loss of wages they incurred regarding the allegations contained in their Complaint.

	All Interrogatories	Plaintiffs have not provided signed Responses to Defendants' Discovery from EACH Plaintiff.
	<b>REQUEST</b>	<b>OUTSTANDING DISCOVERY</b>
	No. 1	Plaintiffs have not provided documents that support their refusal to admit as it relates to Admission Nos. 1, 2, 4, 6, 8 through 30, 33 through 44, 46, 47, and 50 through 55.
	No. 2	Plaintiffs have not produced all documents that they contend support their claims.
	No. 3	Plaintiffs have not produced all documents identified in their responses to the interrogatories set forth above.
	No. 4	Plaintiffs have not produced all statements and communications of all witnesses, including all statements of the Plaintiffs and Defendants, including taped recordings, video recordings, transcriptions of recordings, and written statements.
	No. 5	Plaintiffs have not produced all documents received in every open records request by Motley Legal Group, Kathryn Knowlton and/or Dana McCormick.
	No. 6	Defendants are unclear whether plaintiffs have produced all cell phone videos, pictures, videos, and other recordings of all protests and/or police interactions that have been collected or viewed regarding the Proclamation of Emergency signed on September 30, 2020 by Mayor, Dennis R. McBride.
<b>DATE 06/15/2021</b>	<b>Deficient Responses Rec'd 07/15/2021</b>	<b>OUTSTANDING DISCOVERY to DEFENDANTS FIRST SET OF REQUESTS FOR ADMISSIONS, WRITTEN INTERROGATORIES and REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFFS ADDED TO LAWSUIT IN AMENDED COMPLAINT</b>
	<b>INTERROGATORY</b>	<b>OUTSTANDING DISCOVERY</b>
	No. 1	Plaintiffs have not provided a statement of all facts that support their refusal to "admit" relevant Requests for Admissions.
	No. 2	Plaintiffs have not provided their legal name, date of birth, address, and phone number.
	No. 3	Plaintiffs have not provided a list of all contacts they have had with law enforcement agencies including, but not limited to, arrests, ordinance violations, and warnings and provided the date, location, agency involved, their participation in, and the final result of the contact, from January 1, 2011 to the present.
	Nos. 4 & 5	Plaintiffs have not identified what role Kimberly Motley had at the October 10, 2020 protest at Wauwatosa City Hall and have not identified all communication they had with Kimberly Motley during the October 10, 2020 protest at Wauwatosa City Hall.
	Nos. 6 & 7	Plaintiffs have not identified what role Kimberly Motley had in the protests alleged in the Complaint and have not identified what communication they had with Kimberly Motley at the protests alleged in the Complaint.
	No. 8	Plaintiffs have identified all statements they or anyone acting on their behalf have taken from any individual with information relevant to the allegations contained in the Complaint filed in this action and have not provided the name and address of each individual who conducted an interview or obtained a statement,

		nor identified by name and address the person from whom such a statement has been taken, the date of the statement, and whether the statement was recorded in any fashion. If the statement was oral, plaintiffs have not described the factual nature of the statement nor described why the statement was not recorded in some fashion.
	No. 9	Plaintiffs have not provided a list of the names, addresses, and phone numbers of all witnesses that have provided the statements listed in Interrogatory No. 8, above.
	No. 10	Plaintiffs have not identified each records request they have made, including open record requests and FOIA requests.
	No. 13	Plaintiffs have not explained in detail the physical discomfort, significant emotional distress, trauma, and other injuries they incurred as alleged in their Complaint.
	No. 14	Plaintiffs have not explained in detail how their arrest was unjustified and an unreasonable seizure.
	No. 15	Plaintiffs have not explained in detail how the actions of these Defendants were done in willful, wanton, reckless, and malicious disregard of their constitutional rights as alleged in their Complaint.
	No. 16	Plaintiffs have not itemized all medical expenses they have incurred regarding the allegations contained in their Complaint.
	No. 17	Plaintiffs have not explained how the policy and practices of the Defendants by directing and ordering the emergency curfew was unreasonable, unjustified, and interfered with their First Amendment rights as alleged in their Complaint.
	No. 18	Plaintiffs have not itemized all expenses or loss of wages they have incurred regarding the allegations contained in their Complaint.
	ALL Interrogatories	Plaintiffs have not provided signed Responses from EACH Plaintiff.
	<b>REQUEST</b>	<b>OUTSTANDING DISCOVERY</b>
	No. 1	Plaintiffs have not produced documents to support their refusal to admit relevant Requests for Admissions.
	No. 2	Plaintiffs have not produced all documents identified in their Responses to Interrogatories.
	No. 3	Plaintiffs have not produced “any engagement letter” or document supporting a legally binding relationship between themselves and their attorney(s).
	No. 4	Plaintiffs have not produced copies of all documents supporting their allegations.
	No. 5	Plaintiffs have not produced “ALL” documents supporting their claimed damages.
	No. 6	Plaintiffs have not produced “ALL” statements and communications of all witnesses, statements of plaintiffs and defendants, including taped recordings, video recordings, transcriptions, and written statements.
	No. 7	Plaintiffs have not produced “ALL” documents that have been received in open records requests pertaining to their claims.
	No. 8	Plaintiffs have not produced “ALL” cell phone videos, pictures, videos, and other recordings of all protests and/or police interactions collected or viewed regarding their claims.

		<i>(Defendants acknowledge plaintiffs have disclosed they are in possession of additional videos. They were provided a hard drive in-person on October 28, 2021 to transfer said video. Plaintiffs' counsel indicated they would need 21 days to transfer the data – until November 18, 2021.)</i>
	No. 9	Plaintiffs have not produced a privilege log describing the nature of each document being withheld whereby Plaintiffs invoked attorney-client privilege.
	ALL Requests	Plaintiffs have not provided signed Responses from EACH Plaintiff.
<b>09/13/2021</b>	<b>SUPPLEMENTAL RESPONSES RECEIVED</b>	
	No. 4	
	No. 5	
	No. 6	
	No. 7	
	No. 8	Plaintiffs have not produced “ALL” cell phone videos, pictures, videos, and other recordings of all protests and/or police interactions collected or viewed regarding their claims. <i>(Defendants acknowledge plaintiffs have disclosed they are in possession of additional videos. They were provided a hard drive in-person on October 28, 2021 to transfer said video. Plaintiffs' counsel indicated they would need 21 days to transfer the data – until November 18, 2021.)</i>
	No. 9	Plaintiffs have not provided a privilege log detailing each document being withheld.
<b>DATE 09/14/2021</b>	<b>No Responses Received as of 10/29/2021</b>	<b>OUTSTANDING DISCOVERY to DEFENDANTS FIRST SET OF INTERROGATORIES and REQUESTS FOR PRODUCTION OF DOCUMENTS TO LAVITA BOOKER, REBECCA BURRELL, LAURYN CROSS, JESSICA FENNER, CHRISTINE GROPP, GAIGE GROSSKREUTZ, ADANTE JORDAN, MARK KACHELSKI, JOHN LARRY, ALEX LARSON, VAUN MAYES, SHAWN PAGE, MADELIENE SCHWEITZER, TIFFANY STARK, OSCAR WALTON, JAYDEN WELCH, BRITTA WELCH, and TRISHA WILSON</b>
	<b>INTERROGATORY</b>	<b>OUTSTANDING DISCOVERY</b>
	Interrogatory No. 1	Plaintiffs have not provided their legal name, date of birth, address, and phone number.
	Interrogatory No. 2	Plaintiffs have not provided a list of all contacts they have had with law enforcement agencies including, but not limited to, arrests, ordinance violations, and warnings – including the date, location, agency involved, their participation in, and the final result of the contact, from January 1, 2011 to the present.
	Interrogatory No. 3	Plaintiffs have not identified what communication they had with Kimberly Motley at the protests alleged in the Third Amended Complaint.
	Interrogatory No. 4	Plaintiffs have not identified all statements they or anyone acting on their behalf have taken from any individual with information relevant to the allegations contained in the Third Amended Complaint and have not stated the name and address of each individual who conducted the interview or obtained a statement and identified by name and address the person from whom such statement has been taken, the date of the statement,

		and whether the statement was recorded in any fashion. If the statement was oral, Plaintiffs have not described the factual nature of the statement and described why the statement was not recorded in some fashion.
	Interrogatory No. 5	Plaintiffs have not listed the names, addresses, and phone numbers of all witness that have provided statements listed in Interrogatory No. 5 above.
	Interrogatory No. 6	Plaintiffs have not identified each record request they have made, including open record requests and FOIA requests.
	Interrogatory No. 7	Plaintiffs have not identified and listed all justifications they have for violating the September 30, 2020 Proclamation of Emergency.
	Interrogatory No. 8	Plaintiffs have not identified and listed all justifications they have for violating the Wauwatosa Special Event Permit requirement under Wauwatosa Ordinance 750030.
	Interrogatory No. 9	Plaintiffs have not explained in detail the physical discomfort, significant emotional distress, trauma, and other injuries they have incurred as alleged in their Complaint.
	Interrogatory No. 10	Plaintiffs have not explained in detail how their arrest was unjustified and an unreasonable seizure.
	Interrogatory No. 11	Plaintiffs have not explained in detail how the actions of these Defendants were done in willful, wanton, reckless, and malicious disregard of their constitutional rights as alleged in the Third Amended Complaint.
	Interrogatory No. 12	Plaintiffs have not itemized in detail all medical expenses they have incurred regarding the allegations contained in the Third Amended Complaint.
	Interrogatory No. 13	Plaintiffs have not explained in detail how the policy and practices of the Defendants by directing and ordering the emergency curfew was unreasonable, unjustified, and interfered with Plaintiffs' First Amendment rights as alleged in the operative Complaint.
	Interrogatory No. 14	Plaintiffs have not itemized in detail all expenses or loss of wages they have incurred regarding the allegations contained in the Third Amended Complaint.
	ALL Interrogatories	Plaintiffs have not provided signed Responses from EACH Plaintiff.
	<b>REQUEST</b>	<b>OUTSTANDING DISCOVERY</b>
	Request No. 1	Plaintiffs have not produced all documents identified in their responses to the Interrogatories set forth above.
	Request No. 2	Plaintiffs have not produced any engagement letter or document supporting a legally binding relationship between themselves and their attorney(s) relating to this case.
	Request No. 3	Plaintiffs have not produced all documents supporting their allegations stated in the Third Amended Complaint.
	Request No. 4	Plaintiffs have not produced all documents supporting their claimed damages.
	Request No. 5	Plaintiffs have not produced all statements and communications of all witnesses, including all statements of the Plaintiffs and Defendants, including taped recordings, video recordings, transcriptions of readings, and written statements.

	Request No. 6	Plaintiffs have not produced all documents that have been received in a records request pertaining to their claims set for the Third Amended Complaint.
	Request No. 7	Plaintiffs have not produced all cell phone videos, pictures, videos, and other recordings of all protests and/or police interactions that have been collected or viewed regarding your claims.
	Request No. 8	Plaintiffs have not produced, for each document they contend is privileged, a privilege log (a) describing the documents or electronically stored information withheld; and (b) a clear statement of which privileges they believe covers the documents.
Initial Disclosures		Computation of Damages – Not a single itemized damage